

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, *et al.*

Plaintiffs,

vs.

TYSON FOODS, INC., *et al.*

Defendants.

Case No. 05CV0329JOE-SAJ

**JOINDER BY SEPARATE DEFENDANTS GEORGE’S, INC.  
AND GEORGE’S FARMS, INC., IN MOTIONS FILED  
BY OTHER DEFENDANTS AND INTEGRATED  
OPENING BRIEF IN SUPPORT THEREOF**

Come now the separate Defendants George’s, Inc., and George’s Farms, Inc. (“George’s”), and join in the following Motions filed by other defendants named in the above-referenced litigation, incorporating by reference all statements, arguments, exhibits and points of authority contained therein:

1. Tyson Poultry, Inc.’s Motion to Dismiss Count 3 of Plaintiffs’ First Amended Complaint and Integrated Opening Brief in Support.
2. Tyson Foods, Inc.’s Motion to Dismiss Counts 4-10 of the First Amended Complaint and Integrated Opening Brief in Support.
3. Cobb-Vantress, Inc.’s Motion to Dismiss Counts Four, Six, Seven, Eight, Nine and Ten of the First Amended Complaint or, Alternatively, to Stay the Action and Integrated Opening Brief in Support.

4. Tyson Chicken, Inc.'s Motion to Dismiss Counts 4, 5, 6 and 10 of the First Amended Complaint under the Political Question Doctrine and Integrated Opening Brief in Support.

5. Defendants Tyson Foods, Inc., Tyson Poultry, Inc., Tyson Chicken, Inc. and Cobb-Vantress, Inc.'s Motion for a More Definite Statement With Respect to Counts One and Two of the Amended Complaint and Integrated Opening Brief in Support.

6. Motions to Dismiss filed by Defendant Peterson Farms, Inc and supporting brief.

7. Cargill Defendants' Motion to Strike Designation as Related Case and supporting brief.

WHEREFORE, PREMISES CONSIDERED, George's, Inc., and George's Farms, Inc., pray that the Complaint(s) and amendments thereto by plaintiffs as asserted against George's, Inc. and George's Farms, Inc. be dismissed with prejudice to re-filing, for its costs and attorneys' fees, and for all other just and proper relief.

s/ Randall E. Rose

Randall E. Rose

OBA #7753

Attorney for Defendants George's Inc.

and George's Farms, Inc.

The Owens Law Firm, P.C.

234 West 13<sup>th</sup> Street

Tulsa, OK 74119

(918) 587-0021

(918) 587-6111 Facsimile

**CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2005, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

W.A. Drew Edmondson  
OFFICE OF ATTORNEY GENERAL  
State of Oklahoma  
2300 N. Lincol Blvd, Suite 112  
Oklahoma City, OK 73105  
*Attorney for Plaintiff*

David Phillip Page  
James Randall Miller  
Louis Werner Bullock  
MILLER KEFFER & BULLOCK  
222 S. Kenosha  
Tulsa, OK 74120-2421  
*Attorneys for Plaintiff*

Douglas Allen Wilson  
Melvin David Riggs  
Richard T. Garren  
Sharon K. Weaver  
RIGGS ABNEY NEAL TURPEN  
ORBISON & LEWIS  
502 W. 6<sup>th</sup> St.  
Tulsa, OK 74119-1010  
*Attorneys for Plaintiff*

Robert Allen Nance  
Dorothy Sharon Gentry  
RIGGS ABNEY NEAL TURPEN  
ORBISON & LEWIS  
5801 N. Broadway, Suite 101  
Oklahoma City, OK 73118-7481  
*Attorneys for Plaintiff*

A. Scott McDaniel  
Chris A. Paul  
Nicole M. Longwell  
Philip D. Hixon  
Martin A. Brown  
JOYCE, PAUL & MCDANIEL, P.C.  
1717 S. Boulder Ave., Suite 200  
Tulsa, OK 74119-4833  
*Attorneys for Peterson Farms, Inc.*

Theresa Noble Hill  
John H. Tucker  
Rhodes Hieronymus Jones Tucker & Gable  
POB 21100  
100 W. 5<sup>th</sup> St., Suite 400  
Tulsa, OK 74121-1100  
*Attorneys for Cargill, Inc. and Cargill  
Turkey Production, Inc.*

R. Thomas Lay  
KERR, IRVINE, RHODES & ABLES  
201 Robert S. Kerr Ave., Suite 600  
Oklahoma City, OK 73102-4203  
*Attorneys for Willow Brook Foods, Inc.*

Patrick M. Ryan  
Stephen L. Jantzen  
RYAN, WHALEY, COLDIRON AND  
SHANDY, P.C.  
119 N. Robinson, Room 900  
Oklahoma City, OK 73102-4617  
*Attorneys for Tyson Foods, Inc., Tyson  
Poultry, Inc., Tyson Chicken, Inc., and  
Cobb-Vantress, Inc.*

I further certify that on October 3, 2005, I served the foregoing document by regular mail through the United States Postal Service, postage properly paid, on the following, who are not registered participants of the ECF System:

William H. Narwold  
MOTLEY RICE, LLC  
20 Church St., 17<sup>th</sup> Floor  
Hartford, CT 06103-3290  
*Attorney for Plaintiff*

Elizabeth C. Ward  
Frederick C. Baker  
MOTLEY RICE, LLC  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464  
*Attorneys for Plaintiff*

C. Miles Tolbert  
SECRETARY OF THE ENVIRONMENT  
State of Oklahoma  
3800 N. Classen  
Oklahoma City, OK 73118

s/ Randall E. Rose